

BAMx Comments on CAISO Planning Standards

Proposed Revision

The Bay Area Municipal Transmission Group (BAMx)¹ appreciates the opportunity to comment on the CAISO Planning Standards proposed revision. The comments and questions below address the presentations made by the CAISO during the May 2nd Stakeholder meeting.

BAMx would like to thank the CAISO for the opportunity to comment on the proposed changes to the Planning Standards and to compliment the CAISO's pro-active approach in revising the Planning Standards – eliminating those standards that are not needed and simplifying the application of the standards with specific values. These standards have not been revised in a long time and it is good that the CAISO has started a stakeholder process to consider revisions. However, given the importance of the standards, it is important that the CAISO provide adequate time to fully vet the proposed changes with Stakeholders. We do not yet have enough information to know whether to support the changes or not. Below we include some questions/comments for the CAISO consideration.

Voltage Standard

There is no voltage standard in the current WECC or CAISO Planning Standards. We understand that one of the reasons for its absence is that they could not find one that was appropriate for all the different circumstances involved in WECC or CAISO member electric systems. What can you tell us about the extent of the likely dollar/rate impact of the changes being proposed? Are there documented cases of degraded customer voltage problems, which would be alleviated by the proposed standards?

Please elaborate on the process for the PTO to seek exemptions. Do the PTO's expect this standard will cause them to seek exemptions?

Planning for New Transmission versus Involuntary Load Interruption Standard

This revised standard includes specific values, such as 250 MW for group of systems fed from a radial system and 100 MW for single radially fed substation. These are large loads and it seems like a large amount of load to drop for a single contingency. We believe that the nature of the load should be considered in any standard that proposes to interrupt load such as in this case of a radial system. We are aware that your member PTO's with service territories design dramatically

¹ BAMx consists of Alameda Municipal Power, City of Palo Alto Utilities, and City of Santa Clara, Silicon Valley Power.

different distribution systems (networked vs. radial) to serve dense urban areas than they do for rural areas. Are any of these radial systems located in urban areas? We would like to know more about the likely result, including the dollar/rate impact to the customers, of the changes being proposed by the new Standard. Furthermore, we would like to echo some of comments made at the May 2 that if a BCR test is to be used to make exceptions to this standard, the CAISO should propose some guidelines for this test.

Special Protection Systems Guidelines

The revised guidelines emphasized that these are guidelines and judgment will be needed for their application. However, there were no discussions on the process to deviate from these guidelines. What parameters can lead to permissible deviations?

We are wondering why the proposed Guidelines focus on the number of events expected to be monitored versus tracking the expected results of the events and reacting to the result rather than to the events. In many cases, the impact of an event during peak load period would cause an overload, but would not during other times. It seems like a well-designed SPS should not trip load (or other devices) when it is not needed.

We would like to know more about the likely result of the changes being proposed by the new Guidelines.

The schedule published by the CAISO allows one more discussion and comments on the revised standards before it submits them to the Board for approval. Given the importance of the proposed revisions and the extensive time since any revision to the standards, we encourage the CAISO take more time and a few more rounds of discussions with the stakeholders to flush out all the pros and cons of the proposed revised standards.

If you have any questions concerning these comments, please contact Barry Flynn (888-634-7516 and brflynn@flynnrci.com).